

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**ANDRÉ PIERRE GAS AND LA SOCIÉTÉ
GAS BIJOUX,**

Plaintiffs,

v.

**CLAIRE'S STORES, INC., AND
DUALSTAR ENTERTAINMENT GROUP,
LLC,**

Defendants.

Docket No. 07-cv-9650 (PAC)(DFE)

**STIPULATED PERMANENT
INJUNCTION**

Plaintiffs André Pierre Gas and La Société Gas Bijoux (collectively, "Plaintiffs") and Defendants Claire's Stores, Inc. and Dualstar Entertainment Group, LLC (collectively, "Defendants"), by and through their counsel, do hereby stipulate and agree to the entry of a permanent injunction under Federal Rule of Civil Procedure 65, enjoining and restraining the Defendants, their respective officers, agents, servants, employees, contractors and/or any individuals, entities or corporations acting in concert with them or under Defendants' direction, authority or control from:

- A. Creating, manufacturing, importing, purchasing, distributing, displaying, offering to sell, and/or selling jewelry that infringes upon Plaintiffs' rights in any design referred to in the Complaint in this Action or in the Complaint filed by Plaintiffs in the counterfeiting action against Claire's France in France (Case No. N°RG 06/16619) (hereinafter, the "French Action");
- B. Manufacturing, purchasing, distributing, displaying, marketing, advertising, using, offering to sell, and/or selling jewelry using the trademark GAS;
- C. Using or inducing others to use Plaintiffs' copyrights, trademarks or trade dress for any design referred to in the Complaint in this Action or in the French Action, or any infringing copy or imitation of any of them in any manner, including, but not limited to advertising, promoting, and/or marketing jewelry; and

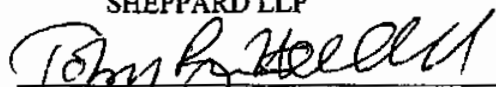
- D. Committing or inducing others to commit any other infringing acts that damage or harm Plaintiffs' rights in any jewelry design referred to in the Complaint in this Action or in the French Action, or in any other jewelry design that infringes upon Plaintiffs' aforesaid jewelry designs.

It is further stipulated if Plaintiffs learn of any *de minimus* violations of this Injunction (defined as the discovery of three (3) or less units of), Plaintiffs will provide written notice of such violation prior to seeking judicial relief pursuant to this injunction.

It is further stipulated that the Honorable Paul A. Crotty, United States District Judge, or his successor, shall retain jurisdiction to enforce this Stipulated Permanent Injunction.

IT IS SO STIPULATED:


COWAN, DEBAETS, ABRAHAMS &
SHEPPARD LLP


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*Attorneys for Defendant Dualstar Entertainment
Group, LLC*

SO ORDERED

Dated: _____

See Pg 4 
HON. PAUL A. CROTTY, U.S.D.J.

(2)

- D. Committing or inducing others to commit any other infringing acts that damage or harm Plaintiffs' rights in any jewelry design referred to in the Complaint in this Action or in the French Action, or in any other jewelry design that infringes upon Plaintiffs' aforesaid jewelry designs.

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(3)

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SO ORDERED

Dated: March 18, 2008

Paul A. Crotty
HON. PAUL A. CROTTY, U.S.D.J.

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